

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In Re:)	Case No: 16-10552-399
)	Chapter 13
Michael Stephen Kelley,)	
)	
Debtor,)	Hearing Date: June 12, 2017
)	Hearing Time: 1:45 p.m.
The Bank of New York Mellon,)	Courtroom: Cape Girardeau
)	
Movant.)	

**DEBTOR'S RESPONSE TO CREDITOR'S MOTION FOR RELIEF FROM
AUTOMATIC STAY**

COMES NOW Debtor, by and through the attorney of record, and by way of Response to Movant's Motion for Relief, states to the Court as follows:

1. Debtor admits the allegations contained in paragraph 1 of Movant's motion.
2. Debtor admits the allegations contained in paragraph 2 of Movant's motion.
3. Debtor admits the allegations contained in paragraph 3 of Movant's motion.
4. Debtor admits the allegations contained in paragraph 4 of Movant's motion.
5. Debtor is without sufficient information to admit or deny the allegations contained in paragraph 5 of Movant's motion and therefore denies same.
6. Debtor is without sufficient information to admit or deny the allegations contained in paragraph 6 of Movant's motion and therefore denies same.
7. Debtor is without sufficient information to admit or deny the allegations contained in paragraph 7 of Movant's motion and therefore denies same.
8. Debtor is without sufficient information to admit or deny the allegations contained in paragraph 8 of Movant's motion and therefore denies same.
9. Debtor admits the allegations contained in paragraph 9 of Movant's motion.

10. Debtor admits the allegations contained in paragraph 10 of Movant's motion.

11. Debtor denies the allegations contained in paragraph 11 of Movant's motion.

WHEREFORE, Debtor prays this Court deny The Bank of New York Mellon's Motion for Relief, and for such further relief as this Court may deem just and proper.

Respectfully submitted,

ADAMS LAW GROUP

/s/ Jack J. Adams

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of foregoing was served electronically or by first class mail this June 5, 2017 to the following:

Thomas K. O'Loughlin
Chapter 7 Trustee
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United States Trustee
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/s/ Christy Henke

Christy Henke, Paralegal